

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

WALKER COUNTY HOSPITAL CORPORATION, d/b/a  
HUNTSVILLE MEMORIAL HOSPITAL,

Debtor and Debtor in Possession.<sup>1</sup>

Chapter 11

Case No. 19-36300

**DECLARATION AND DISCLOSURE STATEMENT OF CAROLYN RUSSELL, ON BEHALF  
OF OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**

Pursuant to 28 U.S.C. § 1746, I, Carolyn Russell, declare:

1. I am the Managing Shareholder of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. located at 500 Dallas, Suite 3000, Houston, Texas 77002 (the “*Firm*”).
2. The above-captioned debtor and debtor in possession (the “*Debtor*”) has requested that the Firm provide legal services to the Debtor, and the Firm has consented to provide such services (the “*Services*”).
3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to this Chapter 11 Case, for persons that are parties in interest in the Chapter 11 Case.
4. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtor or other parties in interest in this Chapter 11 Case.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are: 0960. The location of the Debtor’s service address is: P.O. Box 4001, Huntsville, TX 77342-4001, Attn: Steven Smith.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtor with any other person, other than the principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtor or its estate, with respect to the matters on which the Firm is to be retained.

7. The Debtor owes the Firm \$12,345.00 for prepetition services.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtor, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described in this declaration, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2020.

By: Carolyn Russell  
Carolyn Russell